



FEB 27 1946

CHARLES ELMORE DROPLEY
CLERK

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1945

No. 779

PAUL GINSBURG,

*Petitioner,**vs.*

RUSSELL H. ADAMS

ANSWER TO PETITION FOR WRIT OF CERTIORARI

And now, to-wit, this 26th day of February, 1946 comes Russell H. Adams by George F. P. Langfitt, his attorney, and files the following answer to the petition for a Writ of Certiorari filed in the above entitled case.

First: The petitioner, Paul Ginsburg, has had his day in Court and the matters set forth in the petition for certiorari have been fully heard, reviewed and adjudicated in divers proceedings in the Courts of the Commonwealth of Pennsylvania, a list of which proceedings are as follows:

I. Commonwealth of Pennsylvania ex rel. William C. McEldowney vs. John Haney, Commonwealth of Pennsylvania ex rel. Max Perlman vs. John Haney and Commonwealth of Pennsylvania ex rel. Charles

H. Sachs vs. John Haney, Nos. 1, 2 and 3, June Sessions, 1942 (Miscellaneous Docket of the Court of Quarter Sessions of Allegheny County). Habeas Corpus proceedings before Judge William H. McNaugher in which relators were discharged.

II. Commonwealth of Pennsylvania ex rel. Max Perlman vs. McFarland; Commonwealth of Pennsylvania ex rel. Charles H. Sachs vs. McFarland and Commonwealth of Pennsylvania ex rel. William C. McEldowney vs. McFarland at Nos. 192, 193 and 194 June Sessions 1942. (Miscellaneous Docket of the Court of Quarter Sessions of Allegheny County.) Habeas Corpus proceedings before Judge Ralph H. Smith in which relators were discharged.

III. Charles H. Sachs, William C. McEldowney and Max Perlman vs. Philip Ginsburg, No. 3172, January Term, 1943, of the Court of Common Pleas of Allegheny County and appealed at No. 140, March Term, 1943, of the Supreme Court of Pennsylvania. Injunction proceeding before President Judge Harry H. Row and restraining vexatious litigation, and final injunction granted enjoining and restraining the defendant, his attorneys and agents from filing, making or causing to be made any criminal information or informations against the plaintiffs charging them or any of them with conspiracy or criminal libel based upon certain letters or upon any of the matters embraced in criminal information heretofore made. Appeal by plaintiff to the Supreme Court was *non prosessed* on September 28, 1943 and a petition to vacate the *non pros*, filed on October 2, 1943 was refused *eo die*. On December 24, 1945 a new petition to vacate order of *non pros* was filed.

IV. Commonwealth of Pennsylvania ex rel. Philip Ginsburg vs. Russell H. Adams, District Attorney of Allegheny County at No. 276, January Term, 1944, of the Court of Common Pleas of Allegheny County and appealed at No. 45, March Term 1944, of the Supreme Court of Pennsylvania. Mandamus proceeding before Judge G. Malcolm McDonald and Writ of Mandamus refused.

V. Paul Ginsburg vs. Russell H. Adams, at No. 1918, July Term, 1945, in the Court of Common Pleas of Allegheny County and appealed at No. 195, March Term, 1945, of the Supreme Court of Pennsylvania. This was an appeal from a complaint before the Committee of Offenses of the Allegheny County Bar Association of the State of Pennsylvania, which complaint was dismissed by committee duly appointed by said association.

VI. Complaint by Paul Ginsburg, Petitioner, against respondent before the Board of Governance of the Pennsylvania Bar, which complaint was duly reviewed by said Board of Governance and dismissed.

WHEREFORE, respondent avers that there is no merit to the Petition for Writ of Certiorari and prays that same should be dismissed.

RUSSELL L. ADAMS, *pro se.*